

**IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JACKIE FISHER

*Plaintiff,*

vs.

UNIVERSITY OF TEXAS  
MEDICAL BRANCH and  
DAVID WATSON

*Defendants.*

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CIVIL ACTION NO. 4:08-CV-01273

Jury Demanded

**PROPOSED VOIR DIRE QUESTIONS**

1. Have any of you ever been a party to a lawsuit?
2. Were you Plaintiff or Defendant?
3. What was the nature of the lawsuit?
4. Have you or any friends or relatives ever file a complaint of discrimination?
5. What was the result of the complaint?
6. What are your thoughts on that complaint?
7. Have you your friends or relatives ever been accused of discrimination?
8. Been a witness to what you thought was discrimination?
9. What are your thoughts on that complaint?
10. Have you , relative or friend ever have problem with UTMB or UTMB-CMC?
6. What the nature of that problem?
7. Does everyone understand that he Plaintiff, Jackie Fisher, has the burden of proof in this case or to both liability and damages?
8. Does everyone understand that the question is not whether you would have acted differently in dealing with Jackie Fisher, but whether Ms. Fisher was demoted because of

her race?

9. Does everyone understand that what lawyers say, unless on the witness stand, and subject to the oath and cross-examination, is not evidence?
10. The lawyers may, from time to time, object. This is their job. Do everyone agree to NOT hold such objections against their respective clients?
11. The Plaintiff has asked for an award of damages in this case. Does everyone agree to make the Plaintiff prove those damages?
12. Does everyone agree that, if chosen to be a juror, they are not to split the difference on damages, but make the Plaintiff prove each cent of the purported damages?

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

KENT C. SULLIVAN  
First Assistant Attorney General

DAVID S. MORALES  
Deputy Attorney General for Civil Litigation

ROBERT B. O'KEEFE  
Chief, General Litigation Division

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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the above and forgoing document has been sent via certified mail, return receipt requested, and e-mail on February 15, 2008, to the following

individual:

Jo Miller  
505 North Main  
Carriage House  
Conroe, Texas 77301

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SAM LIVELY  
Assistant Attorney General